



1300 I Street, NW
Suite 400 West
Washington, DC 20005

Donald C. Brittingham
Director – Wireless/Spectrum Polic
202 589-3785

January 8, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 – 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Meeting
IB Docket No. 01-185
ET Docket No. 00-258

Dear Ms. Dortch:

On January 7, 2003, Paul Nash of Verizon Wireless and the undersigned met with Commissioner Adelstein to discuss interference issues that arise in conjunction with the deployment of MSS in the 1990-2025 MHz / 2165-2200 MHz bands and how those issues are affected by a potential reallocation of MSS spectrum to other uses.

The use of spectrum immediately above 1990 MHz for MSS (mobile transmit) would result in substantial interference to PCS mobile receivers operating just below 1990 MHz. A guard band is required to separate PCS and MSS operations to ensure that harmful interference does not occur when mobiles are in close proximity to one another. (See attached presentation). As the Commission considers the possible reallocation of MSS spectrum, it should assign spectrum in a manner that does not result in harmful interference to existing services.

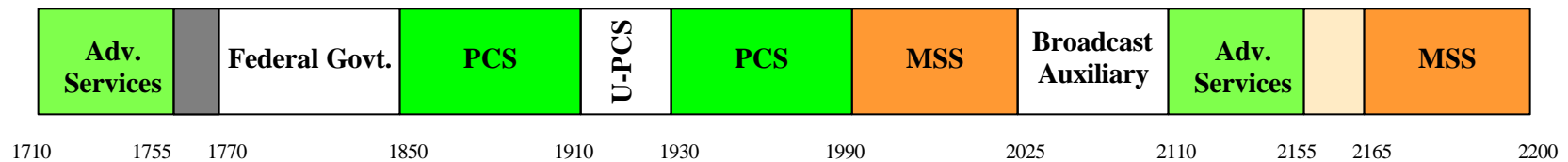
Please include a copy of this ex parte presentation in the record for the above captioned proceedings. If you have any questions, you may call me on (202) 589-3785.

Don Brittingham

Attachment

cc: Commissioner Adelstein

1710 – 2200 MHz Band Plan



Advanced Services (Mobile/Fixed).



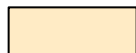
Existing MSS allocation.



Federal spectrum proposed for long-term reallocation to Advanced Services.



PCS

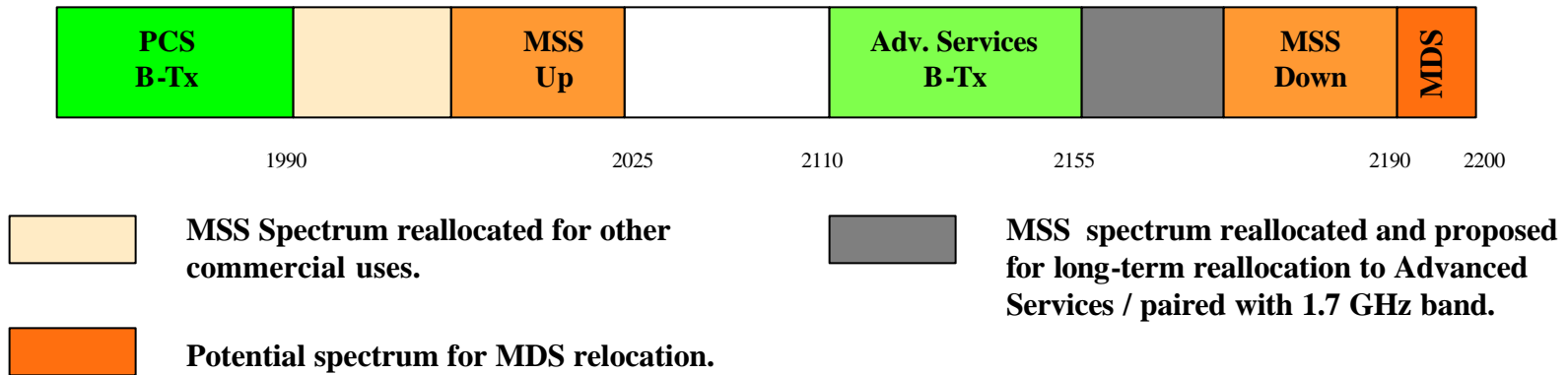


Commercial spectrum proposed for reallocation to advanced services.

Reallocation of MSS Band

1990-2025 MHz / 2165-2200 MHz

- How should band be configured if some, but not all, MSS spectrum were reallocated?

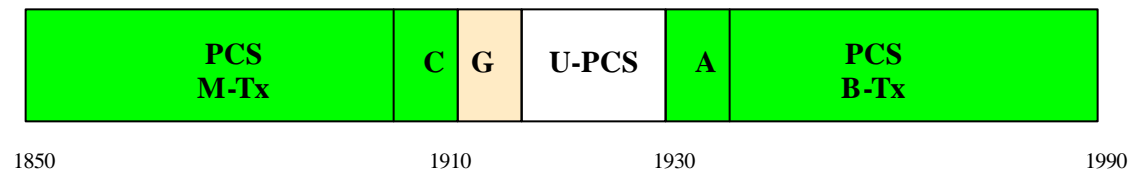


- There must be sufficient guard bands between PCS and MSS bands to prevent MSS mobiles from interfering into PCS handsets at the 1990 MHz band edge.
- Any new uses of spectrum above 1990 MHz must protect PCS mobiles – e.g., unlicensed.
- Interference to Advanced Services above 2110 MHz is not expected to be a problem since both MSS and Advanced Services would use the upper band for mobile receive.
- Relocated MDS band is likely to be used for TDD and should be separated from Advanced Services mobile receive band.

Reallocation of U-PCS Band

1910-1930 MHz

- Should portion of U-PCS band be reallocated for new PCS spectrum (e.g., G block)?



- There must be sufficient guard bands between PCS transmit and receive bands to prevent G block mobile transmitters from interfering into A block mobile receivers.
- Question is not just about whether new mobiles can be designed to accommodate greater interference levels, but how **existing** PCS handsets (and customers) will be affected.

PCS Receive Filter

